

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION  
CASE NO. 7:22-cv-03738-TMC-KFM

Kelly Dawsey,  
Plaintiff,  
vs.

Bayerische Motoren Werke  
Aktiengesellschaft and BMW  
Manufacturing Co., LLC,  
collectively d/b/a "BMW Group",  
Defendants.

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DEPOSITION OF CHRISTINE PETRASCH

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DATE TAKEN: August 16, 2023  
TIME BEGAN: 9:58 a.m.  
TIME ENDED: 6:34 p.m.  
LOCATION: Jackson Lewis, PC  
15 South Main Street, Suite 700  
Greenville, South Carolina 29601  
REPORTED BY: Traci L. Barr, RPR

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EXPEDITE COURT REPORTING, LLC  
Traci L. Barr & Associates  
Post Office Box 25882  
Greenville, South Carolina 29616  
info@expeditereporting.com  
(864) 509-0914

1 APPEARANCES:

2

3 BRIAN P. MURPHY, ESQUIRE  
4 Stephenson & Murphy, LLC  
207 Whitsett Street  
5 Greenville, South Carolina 29601  
Brian@stephensonmurphy.com  
6 (864) 370-9400

7

.....On behalf of the Plaintiff

8

9 D. RANDLE MOODY, II, ESQUIRE  
Jackson Lewis, LLP  
15 South Main Street, Suite 700  
10 Greenville, South Carolina 29601  
Randy.moody@jacksonlewis.com  
11 (864) 232-7000

12

and

13

ELLISON F. McCOY, ESQUIRE  
14 Jackson Lewis, PC  
15 15 South Main Street  
Suite 700  
16 Greenville, South Carolina 29601  
Mccoye@jacksonlewis.com  
(864) 232-7000

17

.....On behalf of Defendant BMW Manufacturing, LLC

18

19 KURT M. ROZELSKY, ESQUIRE  
Spencer Fane, LLP  
27 Cleveland Street, Suite 201  
20 Greenville, South Carolina 29601  
Krozelsky@spencerfane.com  
(864) 906-7694

21

.....On behalf of Defendant BMWAG

22

23 ALSO ATTENDING: Paul Lindemann, Kelly Dawsey

24

25

1 A. Contract was for two years.

2 Q. Okay. So initially, you were going to leave in  
3 January of 2020.

4 A. 31st of December '19, so this was the contract  
5 ending date.

6 Q. Okay. And did you have a contract to return to AG  
7 as of January 2020?

8 A. Not at that point.

9 Q. Are you designated as an OFK?

10 A. You mean now? Yes.

11 Q. Okay. When did you first become designated as OFK?

12 A. If I remember correctly, this was 2019.

13 Q. Okay. So while you were still at BMW MC?

14 A. Yes. Maybe beginning 2020.

15 Q. While you were assigned to BMW MC, did you still  
16 receive benefits from BMW AG?

17 A. No, not to my knowledge.

18 (Exhibit Number 1 marked for  
19 identification.)

20 EXAMINATION RESUMED

21 BY MR. MURPHY:

22 Q. Ms. Petrasch, do you recall this e-mail and  
23 attachment that we've marked as Exhibit Number 1?

24 A. Yes.

25 Q. Okay. And this is an e-mail from yourself to Ms.

1 Koepnick and Ms. Burgmeier, correct?

2 A. Yeah.

3 Q. And you sent that on September 23rd of 2021?

4 A. Yes.

5 Q. What is a P -- I don't know if I'm saying this  
6 right -- K-R-E-I-S?

7 A. You mean P Kreis.

8 Q. Kreis. Okay. I'm going to learn a lot today. I  
9 get the impression I'll learn some German. That's  
10 good.

11 What is P Kreis?

12 A. P Kreis is a circle, a management circle. It is --  
13 so the P Kreis members are the board members for HR  
14 --

15 Q. Okay.

16 A. -- and some areas within HR, so it is -- we changed  
17 just the codes, but at that time in 2021, it was PM  
18 P zed.

19 Q. P what?

20 A. P zed --

21 MR. McCOY: Zed is Z.

22 THE DEPONENT: Zed.

23 EXAMINATION RESUMED

24 BY MR. MURPHY:

25 Q. All right. Zed.

- 1 A. Zed. And then it was PI and PE.
- 2 Q. Okay. And at the time you wrote this e-mail that
- 3 we've marked as Exhibit Number 1, who was PM?
- 4 A. PM was Barbara Burghardt.
- 5 Q. Okay. Who was P zed?
- 6 A. P zed was Andreas Batz.
- 7 Q. Andreas?
- 8 A. Andreas.
- 9 Q. Okay. Last word?
- 10 A. Batz.
- 11 Q. Can you spell that, please?
- 12 A. B-A-T zed.
- 13 Q. Who was PI?
- 14 A. I think, at that time, it was Nicole Haft-Zboril.
- 15 Q. Can you spell the last word -- last name?
- 16 A. Not really.
- 17 Q. Haft --
- 18 A. Haft-Zboril. H-A-F-T-S-P-O-R-E-L.
- 19 Q. Okay. And I appreciate you doing that for us.
- 20 Who was PE?
- 21 A. PE was -- I do not remember. I think, because we
- 22 had a change, it was Rudy Riechinauir at that time.
- 23 Q. Excuse me?
- 24 A. Rudy Riechinauir.
- 25 Q. Okay. Can you -- and I'm sorry we're going to do

1 it, but we're going to do it at some point.

2 Can you spell the first and last names, please?

3 A. Rudolph --

4 Q. Rudolph. Okay.

5 A. Riechinauir is R-I-E-C-H-I-N-A-U-I-R.

6 Q. Okay.

7 A. But I'm not 100 percent sure because we got the  
8 change in the position PI, and I do not know if  
9 this was still '21 or if we -- I think it was  
10 correct, but to my best knowledge, to my best  
11 guess.

12 Q. The individuals that you identified as being in the  
13 positions of PM, PZ, PI, and PE, are they all  
14 employed by BMW AG?

15 A. Yeah.

16 Part of the P circle is also IT, somebody from IT,  
17 and from controlling.

18 Q. Okay. And since we're using a lot of  
19 abbreviations, let me just make sure we're on the  
20 same page.

21 IT is information technology?

22 A. Correct.

23 Q. Okay. And controlling, that's, like, the  
24 accounting or finance area?

25 A. It's finance area.

1 Q. Finance. Okay.

2 And in this e-mail, you're sending them a revised  
3 -- you're sending Ms. Koepnick and Ms. Burgmeier a  
4 revised version of a reorganization plan for MC,  
5 correct?

6 MR. McCOY: Object to the form.

7 You can answer, Christine.

8 THE DEPONENT: I gave them information about my proposal,  
9 how I would staff my department.

10 EXAMINATION RESUMED

11 BY MR. MURPHY:

12 Q. Okay. And you're asking them, let me know if it's  
13 okay for you, right?

14 MR. McCOY: Object to the form.

15 You can answer, Christine.

16 THE DEPONENT: I asked them if it is okay for them  
17 because one of the associates, my direct reports,  
18 was Eva Burgmeier, somebody from Germany, BMW AG,  
19 and I asked if this is okay because we had to get  
20 alignment if she would be available and we can use  
21 her.

22 EXAMINATION RESUMED

23 BY MR. MURPHY:

24 Q. What was Ms. Koepnick's job in September-October of  
25 2021?

1 A. Her abbreviation -- is it correct, abbreviation?  
2 Short code here was PM-6, so she was a direct  
3 report to Barbara Burgmeier. Burghardt. Sorry.  
4 Burghardt. And she was responsible for HR  
5 management, A division, HR, and finance, and Work  
6 Council.

7 Q. Work Council?

8 A. Uh-huh.

9 Q. Okay. What is A division?

10 A. A division is -- you have more disciplines in the A  
11 division, so you have legal is part of the A  
12 division. You have communication, compliance,  
13 strategy, quality, and revision means, I think,  
14 audit. These are the functions you have in the A  
15 division.

16 Q. Okay. And she also had HR?

17 A. Yes.

18 Q. And finance and Work Council, correct?

19 A. Yeah. And finance and the F division, which we  
20 call F division, it's finance and IT.

21 Q. And did Ms. Koepnick have this responsibility for  
22 all the BMW Group companies?

23 A. Ms. Koepnick's responsibility is to lead a network,  
24 an HR network, for best practice sharing,  
25 alignment, and information sharing.



1 Q. Okay. And who is a member of this network?

2 A. It's me, for example.

3 Q. Okay. Is it all the BMW Group companies?

4 A. It's all the BMW Group companies.

5 Q. Okay.

6 (Exhibit Number 2 marked for  
7 identification.)

8 MR. ROZELSKY: Brian, were all of these documents  
9 provided pursuant to the local rules before this  
10 deposition?

11 MR. MURPHY: They were exchanged in discovery, yeah.

12 MR. ROZELSKY: I don't think that's what the rule says.  
13 I'm asking Rule 30H.

14 MR. MURPHY: They were all exchanged in discovery.

15 MR. ROZELSKY: Okay. So it says if documents are  
16 provided or otherwise identified at least seven  
17 days before the deposition, the witness or witness'  
18 counsel do not have the right to discuss the  
19 documents privately during the deposition.  
20 Your position is if it's exchanged in discovery,  
21 it's fine?

22 MR. MURPHY: Yes.

23 MR. ROZELSKY: Okay. I disagree, and we're going to  
24 reserve the right to talk to her about documents.

25 MR. MURPHY: Well, if you talk to her, then I want it

1           noted on the record you're talking to her.

2 MR. ROZELSKY: Sure.

3                               EXAMINATION RESUMED

4 BY MR. MURPHY:

5 Q.     Ms. Petrasch, do you recall the document that we've  
6           marked as Exhibit Number 2?

7 A.     Yes.

8 Q.     Okay. And this is another version of the chart  
9           being sent to Ms. Koepnick, correct?

10 A.     Koepnick, yes.

11 Q.     I will try to do better with these pronunciations.  
12           No disrespect intended. I'm just not great with  
13           that.

14           You sent this e-mail on October 11 -- I'm sorry --  
15           October 1 of 2021, correct?

16 A.     Correct.

17 Q.     Okay. What changes were made in the proposed  
18           structure from the one made in September and the  
19           one that you sent Ms. Koepnick in October?

20 A.     You can see the changes if you compare both. The  
21           difference here is that Kelly was -- first, my  
22           proposal was to put her into the TX-61 function,  
23           and after a discussion I had with Sherry, you can  
24           see now that I put her in the TX-64 function.

25 Q.     Okay. And originally, when you proposed that Ms.

1 Dawsey went to TX-64, Mr. Medley was going to stay  
2 in TX-64, correct?

3 A. No. Corey Epps, who was, at that time, 61 would  
4 move to 64.

5 Q. I'm sorry. That's correct.

6 A. So maybe I misunderstood.

7 Q. No, no, you didn't. You did not misunderstand.  
8 You got it right.

9 A. So the first proposal was -- only for clarification  
10 so that we are clear, the first proposal was that  
11 TX-60 would be Eva Burgmeier. We would move Kelly  
12 to the function TX-61. We would move Corey to the  
13 function TX-64, and Scott would move to the HR  
14 project we just set up for business needs.  
15 The second one was now that Eva Burgmeier would  
16 move to TX-60, Kelly would move to 64, and Scott  
17 would move to the HR project.

18 Q. Right. So let me restate it because you were  
19 correct and I was wrong.

20 The other difference is that Corey Epps was to stay  
21 in -- he was to move, originally, from 61 to 64,  
22 and in the revised proposal, he stays in 61?

23 A. Yes.

24 Q. Let's go back to Exhibit Number 1 for a minute if  
25 you could.

1 In your 9/23 e-mail, you discuss the P circle  
2 meeting the next week. Do you see that?

3 A. Where are you?

4 Q. The last sentence.

5 A. Oh, yeah. Uh-huh.

6 Q. Okay. Ma'am?

7 A. Yeah. This is Exhibit 1. Sorry.

8 Q. Again, I'm -- I just need you to verbalize your  
9 answer, so if I asked, if you see it, the answer  
10 would be yes. Correct?

11 A. Yes, that's correct.

12 Q. You're being very responsive, and I appreciate  
13 that.

14 Did the P circle meet the next week?

15 A. I only can guess, yes, because I do not exactly  
16 know.

17 Q. Okay. You don't participate in those P circle  
18 meetings?

19 A. No.

20 Q. Did anybody from BMW MC participate in the P circle  
21 meeting?

22 A. No.

23 Q. Back to Exhibit Number 2, who was the long-time  
24 TX-6 assistant that Sherry did not want to work  
25 with?

1 A. It was Marlyn Owens.

2 Q. What was her position?

3 A. Assistant. She was my assistant at TX-6.

4 Q. Who is Karl Hacker?

5 A. Karl Hacker, he is a BMW AG OFK in the HR area.

6 Q. Does -- is he a direct report to Ms. Burghardt?

7 Let me ask more specifically.

8 (Exhibit Number 3 marked for  
9 identification.)

10 MR. McCOY: I'm going to exercise my right to talk with  
11 the witness about this e-mail.

12 MR. MURPHY: So you're taking the position that any  
13 document exchanged in discovery that's not  
14 specifically identified --

15 MR. McCOY: Identified as an exhibit at least seven days  
16 in advance of the deposition we can discuss, yes.  
17 Do you want me to get the local rules? We can read  
18 it.

19 MR. MURPHY: I know what the local rule says. I -- I  
20 don't believe it applies when the documents have  
21 been exchanged more than seven days, but if you're  
22 going to take that position, I expect you to take  
23 that position during Kelly's deposition as well.

24 MR. McCOY: Certainly.

25 MR. MURPHY: Okay. We'll see if it becomes an issue, but

1 A. Yeah. Yes.

2 Q. Okay.

3 A. Sorry.

4 Q. Why were you in Germany on January 4th?

5 A. I was on vacation.

6 Q. When did you leave for that vacation?

7 A. I think it was the 15th of December.

8 Q. Did you leave for vacation prior to Thanksgiving?

9 A. When was Thanksgiving? Sorry.

10 Q. Thanksgiving is in November, late November.

11 A. Say your question again.

12 Q. Late November. Were you on vacation during

13 Thanksgiving, late November, of 2021?

14 A. I cannot recall.

15 Q. Do you believe you were in the states in early

16 December of 2021?

17 A. What do you mean with "believe"?

18 Q. Were you in the United States in early December of

19 2021?

20 A. If I recall correctly, yes.

21 Q. While you were at BMW MC, did you also take

22 holidays for the month of August?

23 A. I do not recall.

24 Q. Going to Exhibit 4, the top e-mail is dated January

25 7, 2022; is that correct?

1 A. Yes.

2 Q. Okay. Who sent that e-mail?

3 A. So what I can see here is it was from Ilka  
4 Horstmeier.

5 Q. Who did she sent it to?

6 A. To Barbara Burghardt.

7 Q. Okay. That's her boss, right?

8 A. Ilka Horstmeier is the boss of Barbara Burghardt.

9 Q. Okay. And both of them work for BMW AG; is that  
10 correct?

11 A. Yeah. Yes.

12 Q. Okay. And Ms. Horstmeier is responding to an  
13 e-mail that Ms. Burghardt sent her, correct, on  
14 January 4?

15 A. That's correct.

16 Q. Okay. And Ms. Burghardt was forwarding to Ms.  
17 Horstmeier an e-mail she received from Uwe Bald of  
18 January 4 regarding Kelly Dawsey, correct?

19 A. Correct.

20 Q. And Mr. Bald was forwarding an e-mail you sent to  
21 him, Claudia, and Eva on January 4?

22 A. Yeah. Correct.

23 Q. Who is Uwe Bald?

24 A. Uwe Bald is a direct report to Barbara Burghardt.  
25 He's what Claudia Koepnick is, what we just

1           discussed for A, F, and HR. He's the same -- he  
2           has the same responsibility for the T division, the  
3           production, and has code PM-3.

4       Q.     Why did you inform Ms. Koepnick and Mr. Bald of  
5           Kelly's resignation?

6       A.     I informed both. Claudia Koepnick, because she is  
7           coordinating the HR network, Uwe Bald is  
8           coordinating the production network where we are as  
9           TX-6 in the production area, and we had Eva  
10          Burgmeier as BMW AG employee on our list. We  
11          wanted to work with her together, and this is why  
12          it was important that they get the information how  
13          we need -- what are the next steps to work after  
14          the information that Kelly voluntarily resigned,  
15          how we would deal with the situation.

16      Q.     On January 4, Ms. Burgmeier was already at BMW MC,  
17           wasn't she?

18      A.     If I recall correctly, no.

19      Q.     She wasn't coming from production, was she?

20      A.     Say it again.

21      Q.     She didn't come from production?

22      A.     At that point -- so her last job was P -- within  
23          the PM-6 team, responsible for the HR portion,  
24          within Claudia Koepnick's team, part of the HR  
25          portion.



1 Q. And Claudia didn't have production, did she?

2 A. Claudia did not have production. Uwe had  
3 production, but TX-6. So TX is part of the  
4 production, so we are part of our international  
5 production network, also SHR division, our team,  
6 and this is why we also share information on the  
7 production side on the T side -- this is why it is  
8 T -- with Uwe Bald. And he is responsible for HR  
9 management production, so the same what Claudia  
10 Koepnick is. She's responsible for HR management  
11 for the A division, F, and HR.

12 Q. Going to the top of Exhibit 4, Ms. Horstmeier did  
13 not include you in her e-mail to Ms. Burghardt, did  
14 she?

15 A. No.

16 Q. Go ahead and read to me in English what Ms.  
17 Horstmeier is saying.

18 A. So I would better read it in German than to -- so I  
19 can translate it to you.

20 Q. Please.

21 A. But I do not want to speculate, so --

22 Q. I'm not asking you to interpret it. Just tell me  
23 what it says.

24 A. She said okay. Also here we will find a solution.  
25 Please work on a team -- on a mix in your team

1 business-wise and also diversity-wise. We need  
2 signals also from BMW USA. Sky Foster -- so this  
3 is Sky Foster. She was here at BMW MC -- told her  
4 that -- told her that before she left. And then  
5 she said please alignment in the P circuit. And  
6 then she said best regards, Ilka. And under PS,  
7 she said is the hand-over for Sherry already  
8 running.

9 Q. Go back to what she said about the P circle. She  
10 said make sure there is alignment in the P circle?

11 MR. McCOY: Object to the form.

12 You can answer.

13 EXAMINATION RESUMED

14 BY MR. MURPHY:

15 Q. Tell me what you said or how you read it.

16 A. I said and please alignment in the P circle.

17 Q. What do you understand that to mean?

18 MR. McCOY: Object to the form.

19 You can answer, Christine.

20 THE DEPONENT: Alignment is that she wanted to have  
21 information how we would do this, what we will do.  
22 It's information sharing.

23 EXAMINATION RESUMED

24 BY MR. MURPHY:

25 Q. And she's asking that of Ms. Burghardt, correct?

1           You can answer, Christine.

2   THE DEPONENT: It is not a direct link to the 64 function  
3           because what you see under B, the topic B I  
4           mentioned, is that we would do maybe again an  
5           organizational change in 64. This is where I said  
6           64, we do an organizational change, and we would go  
7           into the direction master structure.

8   Q.   What did you mean by "master structure"?

9   A.   Master structure is that we have a kind of  
10          blueprint how an HR organization would look like in  
11          a plant, and we had a master structure, so that  
12          TX-64 function was or is only health, food, and  
13          safety. And if it would go back into this function  
14          or this organizational step, this is what we then  
15          would call function level 4 function.

16   Q.   Okay.

17   A.   So our TX-64 was different.

18   Q.   Okay. Different than what?

19   A.   Than the master.

20   Q.   Okay. Who put out the master structure?

21   A.   The master structure is a --

22   MR. ROZELSKY: Object to the form.

23   THE DEPONENT: -- orientation which we develop to  
24          together in our international network circuit,  
25          together with support from F0. This is the

1 responsible unit for organizational development.

2 EXAMINATION RESUMED

3 BY MR. MURPHY:

4 Q. Okay. F0 is what?

5 A. F0 is organizational development.

6 Q. That's part of the F circle or finance?

7 A. It's a part of the F circle.

8 Q. Which is finance, correct?

9 A. It's more. It's finance and IT. This is what I  
10 told you before. And F0 is also part of that.

11 (Exhibit Number 6 marked for  
12 identification.)

13 EXAMINATION RESUMED

14 BY MR. MURPHY:

15 Q. I've handed you a document marked Exhibit Number 6,  
16 which is BMW MC document 301.

17 Do you see the top header says, International  
18 Grading FLIV Approval Committee TS Spartanburg? Do  
19 you see that?

20 A. Yes.

21 Q. What is an International Grading FLIV Approval  
22 Committee?

23 MR. McCOY: Object to the form.

24 You can answer, Christine.

25 THE DEPONENT: An International Grading Function Level IV

1 Approval Committee is we have -- because of our  
2 size and production network, and we were working  
3 all over the world, this is where we have an  
4 International Grading Committee for Function Level  
5 IV to align functions so that it doesn't matter  
6 where we have a function, we get an orientation.  
7 We are using Mercer -- or I don't know if it was  
8 2011 that we used Mercer because I saw 2011, but we  
9 are using an external partner to help us to do this  
10 grading for the functions.

11 EXAMINATION RESUMED

12 BY MR. MURPHY:

13 Q. Who serves on the approval committee?

14 A. I don't know.

15 Q. Did you ever serve on the FLIV, or Function Level  
16 IV, Approve Committee?

17 A. No.

18 Q. Did anyone from BMW MC in Spartanburg ever serve on  
19 the International Grading FLIV Approval Committee?

20 MR. McCOY: Object to the form.

21 You can answer, Christine.

22 EXAMINATION RESUMED

23 BY MR. MURPHY:

24 Q. To the best of your knowledge.

25 I'll rephrase it.

1 Do you know of anyone at BMW MC who ever served on  
2 the FLIV Approval Committee?

3 A. I don't know.

4 Q. Is Exhibit 6 an example of part of the master  
5 structure that you were referring to?

6 A. So to answer correctly, the master structure has  
7 nothing to do with grading. So the master  
8 structure is the structure how you would organize  
9 an HR organization. This is not linked to grading.

10 EXAMINATION RESUMED

11 BY MR. MURPHY:

12 Q. Okay. Can you name for me anyone who has served on  
13 -- well, strike that.

14 The document we marked as Exhibit Number 6  
15 discusses an FLIV Approval Committee.

16 Is there an FLIII Approval Committee?

17 A. I don't know the structure right now. I don't know  
18 which structure they have.

19 Q. Are you aware of an International Grading Committee  
20 at BMW AG or BMW Group?

21 MR. McCOY: Object to the form.

22 You can answer, Christine.

23 THE DEPONENT: We have one department in Germany  
24 responsible for grading, but I do not know what  
25 kind of structure they have.

1 A. F0 is part of the F circle and is responsible for  
2 organizational development internationally-wise.

3 Q. Okay. So who is Eszter Belinszki?

4 A. Eszter Belinszki, at that time, was my counterpart  
5 to discuss organizational development.

6 Q. Okay. And who did Eszter Belinszki work for?

7 A. He worked for Johannes Trauth.

8 Q. And what was Mr. Trauth's job at the time?

9 A. He was responsible for organizational development  
10 for the -- if I'm correct, for the T division.

11 Q. So was --

12 A. But maybe I'm not correct that it was T division,  
13 but he was responsible for organizational  
14 development --

15 Q. Okay.

16 A. -- as F0-1.

17 Q. Okay.

18 A. So F0-1, if I am correct, the HR portion of that,  
19 HR development, organizational development. I  
20 think this is correct.

21 Q. So F0-1 is the HR part of Mr. Trauth's  
22 organization?

23 A. I would need to check the short codes again. F0-1  
24 responsibility was also HR organizational  
25 development.

1 Q. Okay. And are the pages 424 through 429, the  
2 attachment to the first page of Exhibit 8, your  
3 e-mail of March 19?

4 A. Yes.

5 Q. Okay. Do you know why you didn't send the  
6 attachment through the BMW Group cloud?

7 A. No, I don't know.

8 Q. Are you able to testify that the document 424  
9 through 429 was the document on the BMW Group cloud  
10 - exchange drive referred to in Exhibit 7?

11 MR. McCOY: Object to the form.

12 You can answer, Christine.

13 THE DEPONENT: I cannot testify -- how do you -- testify,  
14 say that it is exactly what was in the drive, but  
15 this was -- so what we discussed here was a review  
16 on our organizational development. So at that  
17 time, this was the work-in-progress status we had.

18 EXAMINATION RESUMED

19 BY MR. MURPHY:

20 Q. You're referring to the attachment of 424 through  
21 429?

22 A. Yeah.

23 Q. Okay. Let me take you to page 425, or BMW MC 425,  
24 the second page of the attachment.

25 A. Uh-huh.



1 Q. Substructure for TX-6, confirmed in F0 circle  
2 November 4th, 2019.

3 Do you see that?

4 A. Uh-huh.

5 Q. Ma'am?

6 MR. McCOY: Yes.

7 THE DEPONENT: Yes.

8 EXAMINATION RESUMED

9 BY MR. MURPHY:

10 Q. Sorry for that. I hope you understand why we need  
11 to do that.

12 A. No, no, no.

13 Q. Does BMW MC 425 show the substructure for TX-6 that  
14 was confirmed by the F0 circle?

15 MR. McCOY: Object to the form.

16 You can answer, Christine.

17 THE DEPONENT: Say it again.

18 EXAMINATION RESUMED

19 BY MR. MURPHY:

20 Q. Does BMW MC 425, the second page of the attachment,  
21 show the substructure for TX-6 that was confirmed  
22 in the F0 circle?

23 A. Yeah. Yes.

24 Q. Who were the members of the F0 circle?

25 A. I don't know.

1 Q. Were you a member of the F0 circle?

2 A. No.

3 Q. Was anybody from BMW MC a member of the F0 circle?

4 A. No.

5 Q. Was Eszter Belinszki a member of the F0 circle?

6 A. No.

7 Q. Was Mr. Trauth a member of the F0 circle?

8 A. Yes.

9 Q. Sitting here today, can you tell me who were any  
10 other members of the F0 circle in March of 2021?

11 A. No, I cannot.

12 Q. And in March of 2021, Mr. Trauth was employed by  
13 BMW AG?

14 A. Yeah. Correct.

15 Q. Let's go to page 426 on Exhibit 8, BMW MC 426.

16 Does this reflect your proposal for the  
17 organization of TX-6 in Spartanburg for the first  
18 quarter of 2021?

19 A. Say it again.

20 Q. Well, let me ask it this way. Did you create the  
21 document that is Bates numbered BMW MC 426?

22 A. Yeah. Yes.

23 Q. Okay. Why did you create this document?

24 A. I created the document because organizational  
25 development, so we had to prepare us for our next

1 step. So we got -- we discussed global assignment  
2 at that time, if we want to move it or not. We  
3 discussed OFK payroll came to TX-6, and we  
4 discussed if the TX-64, with the combination of  
5 health management, occupational and safety, and  
6 recruiting, is how we want to move on.

7 Q. In March of 2021, were you discussing or proposing  
8 any changes to TX-60?

9 MR. ROZELSKY: Object to the form.

10 THE DEPONENT: So I proposed the change for global  
11 assignment, which we moved from recruiting over to  
12 planning and steering.

13 EXAMINATION RESUMED

14 BY MR. MURPHY:

15 Q. Okay.

16 A. But let me be precise. I think this is what we did  
17 already in 2019, and we confirmed that it would be  
18 part here of the TX-600 function.

19 Q. Okay. Let me ask you -- you've used the term the  
20 "global assignment."

21 A. Uh-huh.

22 Q. Was the global assignment previously TX-66?

23 A. No.

24 Q. Okay. Tell me what you mean by the -- when you use  
25 the term "global assignment."

1 BY MR. MURPHY:

2 Q. Ms. Petrasch, do you recall the e-mails we've  
3 marked as Exhibit 9, which is BMW 23 and 24?

4 A. Yeah.

5 Q. Okay. Your e-mail to Ms. Koepnick of April 20 is  
6 the first e-mail, correct?

7 A. What do you mean, this is the first e-mail?

8 Q. That appears on this exhibit.

9 A. Yeah.

10 Q. Okay. Let me just ask, what does Dienstag mean?

11 A. Where is it?

12 Q. Right next to where it says 20 April 2021, the word  
13 Dienstag shows up. What does that mean?  
14 I know I'm saying it right.

15 A. You maybe spelled it right. It's Tuesday,  
16 Dienstag.

17 (Discussion held off the record.)

18 EXAMINATION RESUMED

19 BY MR. MURPHY:

20 Q. In your e-mail to Ms. Koepnick, you're telling her  
21 that this is the current status after your  
22 conversations with Ms. Burghardt and Mr. Batz; is  
23 that correct?

24 A. Yeah.

25 MR. ROZELSKY: Object to the form.

1 EXAMINATION RESUMED

2 BY MR. MURPHY:

3 Q. Okay. And this is in reference to the attachment,  
4 which is the 2021 Review TX-6 Orga.pptx, which is  
5 the document we've been discussing as part of  
6 Exhibit 8. Is that correct?

7 A. Yeah.

8 Q. Okay. If we go back six days earlier, on the  
9 second e-mail, you have an e-mail from yourself to  
10 Ms. Burghardt, and it looks like it's redacted, but  
11 you also include Mr. Batz, PZ?

12 A. Yeah.

13 Q. You also include Mr. Flor?

14 A. Yeah.

15 Q. Do you know why you included Mr. Flor?

16 A. Because he was my boss at that time.

17 Q. Okay. So he was still president of BMW MC at this  
18 time?

19 A. Yes.

20 Q. Okay. That was before Dr. Engelhorn?

21 A. Yeah.

22 Q. Okay. Now, you begin that e-mail of April 14 with  
23 the statement, attached are the charts for your  
24 discussion in Germany. Do you see that?

25 A. Where are you?

1 Q. The very first sentence of your April 14 e-mail  
2 says, attached are the charts for your discussion  
3 in Germany?

4 A. Yes.

5 Q. Okay. Is that a reference to documents BMW MC 424  
6 through 429 that we discussed as being part of  
7 Exhibit 8?

8 MR. McCOY: Object to the form.

9 You can answer, Christine.

10 EXAMINATION RESUMED

11 BY MR. MURPHY:

12 Q. Again, you see the subject. It says, 2021 Review  
13 TX-6 Orga -- I guess it's a PowerPoint in that  
14 version.

15 Is that the same document that is the attachment in  
16 Exhibit 8?

17 A. I cannot confirm it, but I think it's the same.

18 Q. Okay. What are the discussions -- strike that.  
19 What is the discussion in Germany to which you're  
20 referring?

21 A. The discussion was about the project we wanted to  
22 bring in place because we -- overall,  
23 internationally-wide we saw all -- an urgent need  
24 to have such projects running in the plants, so --  
25 and this is why I set up the project for

1 Spartanburg with all the topics we wanted to  
2 include, and we discussed if the -- if we set up  
3 projects like that at plants, how we can align this  
4 people working on the projects.

5 Q. When you say "the projects," are you referring to  
6 the assignment for Mr. Medley?

7 A. Yes.

8 Q. When you referred to the discussion in Germany,  
9 were you a part of the discussion in Germany?

10 A. I was part of the discussion in Germany about this  
11 project.

12 Q. Okay. When did the discussion take place?

13 A. I -- I think I had -- I do not remember correctly  
14 or I cannot recall, but I think I had telephone  
15 calls with Barbara and also with Andreas Batz.

16 Q. Who is TX-1?

17 A. TX-1 is head of logistics.

18 Q. And who is that?

19 MR. McCOY: Object to the form.

20 You can answer, Christine.

21 EXAMINATION RESUMED

22 BY MR. MURPHY:

23 Q. Well, who was that in April of 2021?

24 A. Good question.

25 Q. Thank you.

1 created that document?

2 A. I think this is the same what I just told you for  
3 39, so I think the form was created from 60,  
4 because 60 was always responsible for reports, but  
5 I think 61 used it, but this is -- I'm not -- I'm  
6 not really sure --

7 Q. That's fine.

8 A. -- if this is correct.

9 Q. That's fine.

10 And what I understand your testimony is that while  
11 the header on page 38 indicates that it might be  
12 the attachment to the e-mail on page 36, you can't  
13 -- you don't really know whether the other pages  
14 also were attached. Right?

15 A. Yeah.

16 Q. Even if 37 was --

17 MR. McCOY: Brian, I think you said 38. Just to clarify,  
18 I think you meant 37.

19 EXAMINATION RESUMED

20 BY MR. MURPHY:

21 Q. 37 is the one that has the same name, right?

22 A. Because 37 has the name two years with starting,  
23 blah, blah, blah, and this is the same we have on  
24 37.

25 Q. Okay. Let's go to your e-mail to Ms. Koepnick.



1 And that's on June 10 of 2021, correct?

2 A. Yeah.

3 Q. Okay. And you start, had a regular appointment  
4 with Barbara this morning and sent this document  
5 with her yesterday finally finished.

6 Do you see that?

7 A. Uh-huh.

8 MR. McCOY: Is that a yes?

9 THE DEPONENT: Yes.

10 EXAMINATION RESUMED

11 BY MR. MURPHY:

12 Q. Okay. What regular appointment did you have with  
13 Ms. Burghardt?

14 A. We have a regular exchange because -- to talk about  
15 my development, to talk about HR topics, to share  
16 information. It was a best-practice  
17 information-share meeting with her.

18 Q. Okay. How often did you have this regular  
19 appointment?

20 A. I don't know. Maybe once a month, but I really  
21 don't know.

22 Q. While you may just be referring to page 38 --

23 A. Maybe can I make one sentence?

24 Q. Of course, ma'am.

25 A. So if there is a regular meeting, regeltermin, this

1 is a regular meeting. This is how you translate  
2 that. It's called regeltermin, and the translation  
3 was regular meeting.

4 Q. I thought I said appointment, but --

5 A. Or appointment.

6 Q. Yeah.

7 A. So this is not a regular appointment, which is on  
8 -- always every week, month, whatever. The  
9 regeltermin means that we did not have a specific  
10 topic, so this means it was an appointment where we  
11 exchanged information.

12 Q. Okay. What is a PE day?

13 A. It's a personal development day. We call it  
14 personalthema in German, and we call it PDD,  
15 personal development day.

16 Q. Okay. What did you mean by PE day? What does that  
17 mean?

18 A. This is what I just explained before. These are  
19 circles where we talk about candidates and we talk  
20 about our people, about other positions or  
21 successor.

22 Q. Okay.

23 A. Most of the time, PDD is combined with succession  
24 planning.

25 Q. Okay.

1 A. Or very often.

2 Q. In terms of the PE day that Ms. Koepnick was having  
3 the next week, who was she meeting with?

4 MR. McCOY: Object to the form.

5 You can answer, Christine.

6 EXAMINATION RESUMED

7 BY MR. MURPHY:

8 Q. Let me back up.

9 You're giving her this information so she could  
10 take it to her PE day the next week, correct?

11 A. Whenever it was, yeah.

12 Q. Okay. Who did you understand she would be meeting  
13 with to discuss the information you were sending  
14 her?

15 A. So they have -- within the international HR  
16 network, they have also a PDD, people development  
17 day, where they talk about -- no, it's not correct.  
18 I didn't say it correct. They have also in Germany  
19 -- it's not international in Germany -- a PE day  
20 where they talk about their German candidates. The  
21 German candidates, if I talk about German  
22 candidates, these are BMW AG candidates.

23 Q. Why were you sending this document to Ms. Koepnick  
24 for her to us in her upcoming PE day?

25 A. I told you before that we wanted to start search

1 project everywhere, so all plans, we wanted to --  
2 our -- we had a business need to talk about or to  
3 create projects for HR topics, future workforce  
4 topics, and the need was to do it also in Germany  
5 and in other countries, and this is why I sent this  
6 information to Germany, so that they knew what we  
7 planned for Spartanburg and they could use it as a  
8 -- how to say -- blueprint or information so that  
9 they knew what we planned to do to adjust a project  
10 or to define their own project in Germany or in  
11 other plants. This is how we share information  
12 because we are working in an international  
13 production network, so we need to be aligned on  
14 some formats, on some processes so that we can  
15 ensure that we have, all over the world, the right  
16 people in the right jobs.

17 Q. Was anyone from BMW MC involved in the PE-day  
18 discussion that Ms. Koepnick was having in June of  
19 2021?

20 A. No, because this is an AG discussion about  
21 candidates, the same what we do here with MC, so  
22 that we discuss our people here within MC.

23 Q. Well, the candidate that AG was discussing would  
24 have been Mr. Medley.

25 A. No, it was not Mr. Medley. It was information that

1 Mr. Medley should take over the project. The  
2 discussion about Scott Medley would take place or  
3 took place here at MC, BMW MC, in the portfolio --  
4 or the succession planning round here at the plant.

5 Q. Let's go to BMW AG 40, then.

6 A. Say it again. On which page?

7 Q. 40, please.

8 A. Yeah.

9 Q. This is the discussion about Scott Medley and the  
10 succession planning for TX-64, right?

11 MR. McCOY: Object to the form.

12 You can answer, Christine.

13 EXAMINATION RESUMED

14 Q. Your answer, ma'am?

15 A. Yes.

16 Q. Okay. And that was a discussion or a document  
17 written for the discussions in Germany?

18 A. No. This was an information, because all what is  
19 here was a discussion we had within BMW MC here in  
20 Spartanburg.

21 Q. If this is about a discussion you're having purely  
22 within BMW MC in Spartanburg, why is it written in  
23 German?

24 A. Because I try to summarize our discussion here,  
25 what we had, and tried to send it in German

1 A. No. This is why I sent her this text, for our  
2 one-to-one later.

3 Q. What did you do you say in the one-to-one?

4 A. I only can guess. We went through the job -- the  
5 TCRs, and we talked about that, to check them. So,  
6 more or less, the translation what I just gave you  
7 from Eszter's e-mail.

8 Q. Do you recall doing that?

9 A. Sorry. Say it again.

10 Q. Do you recall saying that to Ms. Dawsey?

11 A. No, I cannot recall.

12 (Exhibit Number 12 marked for  
13 identification.)

14 EXAMINATION RESUMED

15 BY MR. MURPHY:

16 Q. Ms. Petrasch, do you recall the e-mail chain that  
17 is Bates stamped BMW MC 521 and 522 that we've  
18 marked as Exhibit 12?

19 A. Yes.

20 Q. I'd like to call your attention first to the e-mail  
21 that begins at the bottom of 521, or the first page  
22 of Exhibit 12.

23 You're instructing Ms. Dawsey to provide you with  
24 two job descriptions, correct?

25 A. Yes.

1 Q. Okay. You state, would need to create a draft  
2 version for TX-66 for my meeting tomorrow with, and  
3 that's Ms. Burghardt and Mr. Batz; is that correct?

4 A. Yeah.

5 Q. Okay. Why were you meeting on April 8, 2021, with  
6 Ms. Burghardt and Mr. Batz about TX-66?

7 MR. McCOY: Object to the form.

8 You can answer, Christine.

9 THE DEPONENT: So we --

10 EXAMINATION RESUMED

11 BY MR. MURPHY:

12 Q. I'm sorry. Maybe I got the date wrong.  
13 Did you meet with Ms. Burghardt and Mr. Batz on  
14 April 8, 2021?

15 A. It is stated like that.

16 Q. Do you recall having a meeting with them about  
17 TX-66?

18 A. I'm having a meeting about that. This is what I  
19 can recall. I don't know if it was the 8th or  
20 another day, but we had a meeting on that.

21 Q. Why were you meeting with Ms. Burghardt and Mr.  
22 Batz about TX-66?

23 A. The meeting about TX-66 recruiting was an alignment  
24 meeting with PZ and PM, Mrs. Burghardt and Mr.  
25 Batz, to talk about my idea to split up recruiting

1 in an own unit, in an own team, as TX-66. And why  
2 did I do this? Because recruiting, at that time,  
3 was very difficult and very crucial. It was after  
4 Corona or middle of Corona, where we could not get  
5 people. It was very difficult to hire people, to  
6 bring people on board, and to get the right people  
7 with all what we planned, and this is why I wanted  
8 to have their ideas how do we -- how do we change  
9 our recruiting strategy within the whole group to  
10 make sure that we can get the people on board we  
11 needed for the -- we need for the future. So this  
12 goes along with the future workforce where we  
13 experienced how difficult it is to work on that and  
14 was, again, the -- gave me the indication that we  
15 would need this project, what we discussed.

16 Q. Do you recall telling Ms. Dawsey that you needed  
17 the approval of Ms. Burghardt and Mr. Batz for the  
18 TX-66 position?

19 A. No.

20 Q. Did either Ms. Burghardt or Mr. Batz approve the  
21 TX-66 position?

22 A. No.

23 Q. Who was appointed into the TX-66 position?

24 A. The TX-66 position was one idea based on the  
25 business needs where I just said we thought about



1 her declaration and opposition to a motion to  
2 dismiss, so it's actually been filed. So yeah.  
3 And also, I think I sent all of those to you to  
4 review in that e-mail I sent to you to review  
5 everything. Remember, I said, here is what I'm  
6 going to file, tell me if you think any of it's  
7 confidential? It is Dawsey Bates number 395.

8 MR. McCOY: Thank you.

9 EXAMINATION RESUMED

10 BY MR. MURPHY:

11 Q. Who is -- well, let me ask, Ms. Petrasch, do you  
12 recall this e-mail from Sonja Kamm?

13 A. Yes.

14 Q. Am I saying Kamm right?

15 A. Kamm. No, you didn't say it right. It's actually  
16 Kamm.

17 Q. Kamm. Okay.

18 A. Kamm.

19 Q. All right. I won't say the last name because  
20 you've had enough fun at my expense today, but who  
21 is Franca?

22 A. Franca Niessner.

23 Q. I can't even say Franca right.

24 Who is Franca?

25 A. Franca Niessner. You see Uwe in the second line?

1 Q. That's Mr. Bald, right?

2 A. Exactly, that's Mr. Bald. It's PM-3 responsible  
3 for HR for the T production division. Franca  
4 Niessner is his direct report working on -- with  
5 exchange for all the international plants. So she  
6 is supporting him on that, and Sonja Kamm is a team  
7 member of Franca Niessner.

8 Q. Okay. So who is PM-3?

9 A. PM-3 is Uwe Bald.

10 Q. That's Mr. Bald?

11 A. Yes. A direct report to Barbara Burghardt.

12 Q. And TY-6?

13 A. It's all HR leaders for the plants. This is why it  
14 is a wide. TX-6 was already used for Spartanburg,  
15 and this is why we couldn't use X anymore for more  
16 plants, so this is why we used Y, so it means all  
17 my colleagues.

18 Q. Okay. So you were both TX-6 and one of the TY-6s?

19 A. Correct.

20 Q. Let me take you to the second page. Under target  
21 number 3, it says, gender diversity and inclusion,  
22 AG and BMW Group, P circle change target.

23 Do you know what "P circle change target" means?

24 A. These are targets. The P circle defined as change  
25 targets for HR within the BMW Group.

1 Q. Okay. Do you know what the term "non-AG targets"  
2 means?

3 A. Non-AG targets are -- non-AG means all other plants  
4 besides AG. It means international plants, not  
5 German plants.

6 Q. What does PZ-S-3 mean?

7 A. PZ-S-3 is one team within the P zed -- how do I say  
8 it again? Now I struggle.

9 MR. McCOY: Z.

10 THE DEPONENT: -- PZ organization, and they are  
11 responsible for the topic -- to steer the topic and  
12 strategy for diversion and inclusion for AG and the  
13 BMW Group as a governance function, and all of them  
14 makes sense to have it on a high level, the  
15 targets, because talent management is crucial for  
16 the BMW Group. Sustainability is part of our  
17 annual report, so we had to get the alignment here.  
18 And gender diversity is now the focus on this topic  
19 to get every year better, and every plant should  
20 get better within their own possibilities.

21 Q. Were there targets for any other bases other than  
22 gender?

23 A. Yeah.

24 Q. Okay. What other kind of targets were there?

25 A. We had a discussion, and we said it is -- this is

1 Q. Ms. Petrasch, we were starting to talk about  
2 Exhibit 14.

3 Do you recall these e-mails?

4 A. Yes.

5 Q. Do you recall what they're about?

6 A. Sorry?

7 Q. Do you recall what they're about?

8 A. Yeah.

9 Q. Okay. What is HR compact?

10 A. In -- when was it -- 10/21, so what we started in  
11 our international HR network, we said, we want to  
12 have a benchmark for all our HR functions in the  
13 international plants, and we called this HR  
14 compact.

15 Q. And somebody created a template based on that  
16 compact?

17 A. And this is, again, the same structure, so we work  
18 together with PM-3, and PM-3 offered somebody to  
19 create a template and collect all this information  
20 and coordinate all the submittals and everything,  
21 so that we, at the end, came together to get a full  
22 picture of what we have in the international  
23 plants. If it comes to head count, it was mainly  
24 what kind of tasks, how do we cluster them, and how  
25 many head count was behind.

1 Q. What was the problem, as you understand it, that  
2 Ms. Dawsey was having here?

3 A. Say it again.

4 Q. What problem was Ms. Dawsey having here, as you  
5 understood it?

6 MR. McCOY: Object to the form.

7 You can answer, Christine.

8 THE DEPONENT: The template they provided, it was a  
9 standard template, should fit to all of us, and  
10 Kelly had the situation then that she said. There  
11 are some tasks I -- which I do not know in which  
12 cluster should I put them, and this is the problem  
13 she had, so she listed everything to ensure that we  
14 have all tasks from MC on this list, and during  
15 this whole submittals, 7th, 29th, the coordinator  
16 from PM-3 only tried to bring these clusters  
17 together that, at the end, you can compare the HR  
18 units. And this is where she built clusters, and  
19 she put some of them -- what Kelly had separately  
20 on the list, she put it into her clusters, and this  
21 was Kelly's problem, and I think it was a problem  
22 that didn't change the head-count numbers we had.  
23 It was only with ability, because some of the  
24 topics we did in Spartanburg didn't show up on the  
25 list, but were part of the clusters which we had on

1 out recruiting so that he could focus on this  
2 topic, what he did to build up HR as a business  
3 partner in 61, and this is why we had no final  
4 grading on that function.

5 (Exhibit Number 16 marked for  
6 identification.)

7 MR. McCOY: We'll take a moment to talk about this one.

8 (Recess taken.)

9 EXAMINATION RESUMED

10 BY MR. MURPHY:

11 Q. Ms. Petrasch, do you recall the e-mails that we've  
12 marked as Exhibit 16 --

13 A. Yeah.

14 Q. Which is BMW MC 520?

15 A. Yes.

16 Q. What is P&S?

17 A. Where you are?

18 Q. On Daniela Pekar's or Pekar's e-mail of March 3,  
19 subject P&S TX-6.

20 A. It is planning and steering.

21 Q. Okay.

22 A. So this is part of the 60 function.

23 Q. Okay. And who is Daniela Pekar, P-E-K-A-R?

24 A. Daniela Pekar is in Claudia Koepnick's team.

25 Q. So she is BMW AG?

1 A. Yes.

2 Q. What did she do in March of 2021? What was her  
3 job?

4 A. It was together with -- actually, I think she is --  
5 so she was responsible again to -- for HR Germany,  
6 so HR BMW AG, HR management.

7 Q. She asked you when you'll be back in DE.  
8 What is DE?

9 A. Germany.

10 Q. Okay. And it says Martin Starringer --

11 A. Starringer.

12 Q. -- asked about the above position.  
13 What position is Ms. Pekar referring to?

14 A. She's referring to the planning and steering  
15 position in Kelly's team, so this is Stephan  
16 Dombrowski's replacement.

17 Q. Okay.

18 A. Because we just saw that he was -- his contract  
19 ended mid of 2021.

20 Q. Did Ms. Dawsey request Mr. Starringer?

21 A. Say it again or rephrase it for me.

22 Q. Let me back up and do it this way.

23 After Mr. Dombrowski left, who filled the planning  
24 and steering position in Spartanburg?

25 A. Stephan Dombrowski left mid of '21, and you

1 remember that we had on the list that we wanted to  
2 have a local candidate. It was Michael Davis.

3 Q. So Michael Davis filled that position?

4 A. If I remember correctly, then he was the candidate  
5 we wanted to have, but his performance was not so  
6 good, but I do not know if -- I cannot remember if  
7 he filled exactly the position of him or we changed  
8 things so that he could be part of it. This would  
9 be Kelly's responsibility.

10 Q. In that paragraph where it says Martin Starringer  
11 asked about the above position which will again be  
12 filled with expat, do you see that?

13 A. Yeah.

14 Q. Okay.

15 A. But, you know, if you -- this is translation now.  
16 It is not that we -- what you just said, that we  
17 would fill it again with an expat, it should or  
18 could be filled with an expat. There is a soll at  
19 the end, and this means had -- he asked if this  
20 should be again an expat or not. Because if it  
21 would be an expat, then he would have a candidate,  
22 so he wanted to offer us a candidate would be  
23 interested to come over to MC.

24 Q. That's not what you told Kelly, is it?

25 MR. McCOY: Object to the form.



1 EXAMINATION RESUMED

2 BY MR. MURPHY:

3 Q. Ms. Petrasch, can you identify the document that's  
4 marked BMW AG 75 through 77?

5 A. No, not really. No.

6 Q. Okay. Looking at the first page of it, do you know  
7 what PE-TAG stands for?

8 A. This is what we discussed before. It's a personal  
9 development day where you share information, you  
10 talk about candidates.

11 Q. I remember the term "PE day".

12 A. It's PDD, how we call it here, personal development  
13 day, and PE-TAG is the same in AG.

14 Q. Okay. So PE-TAG is PE day, which is the same as  
15 PDD?

16 A. Yes.

17 Q. And P Kreis, you laughed at me before for  
18 mispronouncing that. I think you've told me.  
19 What does that mean?

20 A. P Kreis, it's the P circle, and we just went  
21 through it is Ilka Horstmeier, with her direct  
22 reports.

23 Q. Which would be Ms. Burghardt?

24 A. Ms. Burghardt, Mr. Batz.

25 And Claudia Koepnick, PM-6, is HR management for

1 the HR people, and this is why she is preparing  
2 information like that. Like the Corey Epps  
3 function, the PDD, he's preparing this for us, MC,  
4 and PM-6 is preparing all the information for this  
5 PE-TAG.

6 Q. Pages 76 and 77, do you see those?

7 A. Yeah.

8 Q. Okay. This long word at the top, N-A-C-H-F-O-L-G-E  
9 --

10 A. Uh-huh.

11 Q. I bet I can guess the second part, but can you tell  
12 me what that word means together?

13 A. It's succession planning.

14 Q. And is this a document that was created in the  
15 meeting with -- that Mr. Epps has with Dr.  
16 Engelhorn and the level 2s?

17 MR. ROZELSKY: Object to the form.

18 EXAMINATION RESUMED

19 BY MR. MURPHY:

20 Q. A while back, you were telling me about a  
21 succession plan meeting that Corey Epps has with  
22 Dr. Engelhorn and the level 2s?

23 A. Uh-huh.

24 Q. Do you remember that?

25 A. Yeah.

1 Q. Is document 76 and 77 an example of the document  
2 that comes from that?

3 A. No.

4 Q. Okay. Do you know who created 76 and 77?

5 A. No.

6 (Exhibit Number 19 marked for  
7 identification.)

8 MR. McCOY: We'll discuss this one as well.

9 (Recess taken.)

10 EXAMINATION RESUMED

11 BY MR. MURPHY:

12 Q. Ms. Petrasch, do you recall the e-mail that's on  
13 the first page of Exhibit 19, which is BMW MC 464?

14 A. Yeah.

15 Q. Okay. And this is an e-mail you sent to Ms.  
16 Burgmeier and Ms. Koepnick, correct?

17 A. Yeah. Uh-huh.

18 Q. Okay. And you're telling them, here is my revised  
19 version?

20 A. Yeah.

21 Q. Okay. And is that a reference to the last two  
22 pages of this exhibit?

23 A. 19?

24 Q. Of 19, yes.

25 A. Yes.

1 Q. And on the second-to-last page of that exhibit,  
2 that's succession planning TX-60, TX-61 --

3 A. Which one are you on? 19?

4 Q. On Exhibit 19 --

5 A. Uh-huh.

6 Q. -- where the document that begins with the word I  
7 can't pronounce, but you told me before means  
8 succession planning.

9 A. Uh-huh.

10 Q. Who created that document?

11 MR. McCOY: Object to the form.

12 You can answer the question, Christine.

13 THE DEPONENT: So if you say, created, what do you mean  
14 with created?

15 EXAMINATION RESUMED

16 BY MR. MURPHY:

17 Q. Did you create this document?

18 A. What I did is I did the update on this.

19 Q. What do you mean by "I did the update"?

20 A. So this is a form we use -- if we talk about  
21 succession planning, we used for our TX-6  
22 organization, and this is where I updated here my  
23 planning which I did in September for the new  
24 organization for the movement we planned.

25 Q. Did Mr. Epps have any role in developing this

1 A. This is what I wrote down at that time.

2 Q. Okay. Why did you say it would be a short-term  
3 change to TX-64 for Corey Epps?

4 A. Because, at that time, we had in the succession  
5 planning for Corey Epps -- you remember we had --  
6 he has a good market situation, so we got a lot of  
7 questions from other technologies if they could  
8 have him for positions like the TX-16 position, the  
9 TV-54 position. This is why, for me, it was not  
10 clear, because if somebody would take him, and he  
11 would like to go in such a position, it could be  
12 that it is only for a short time. This is why I  
13 mentioned this here.

14 Q. Is TX-16 logistics?

15 A. TX-16 is logistics.

16 Q. And TV-54?

17 A. Is also a logistic function for our warehouses.

18 Q. Are those level 3 positions?

19 A. Yeah.

20 Q. Under TX-60, why is Alexander Seefelder's name  
21 listed under Eva Burgmeier?

22 A. So BMW AG collected candidates for this position,  
23 and the name Alexander Seefelder -- and you see him  
24 in gray -- was, in Germany, mentioned for an  
25 international assignment. He was not available,

1 but this is why he was mentioned here as  
2 international candidate.

3 Q. Who, at BMW AG, collected candidates for the TX-60  
4 position?

5 A. The BMW AG, the HR management is collecting people,  
6 international people, for all plants, and it's not  
7 that they collect people for individual positions.  
8 It's more that this kind of people are individual  
9 international people. And we still have, in our  
10 portfolio system, a remark where you can set this  
11 is an international candidate, and then you try to  
12 place him as an international candidate in  
13 different functions as a potential candidate.

14 Q. That wasn't my question.

15 My question was, who, at BMW AG, collected the  
16 candidates?

17 A. It's PM-6.

18 Q. And refresh my recollection again. Is that Ms.  
19 Koepnick?

20 A. Koepnick, in her role as HR management.

21 Q. And there were no domestic candidates listed for  
22 TX-60, is there?

23 A. We did not have at that time -- it was September --  
24 local candidate, because you remember that we  
25 talked about two candidates we had on succession

1 A. Maybe a midterm candidate. This was a potential  
2 name I got from Germany.

3 Q. What made him a good midterm candidate?

4 A. What do you mean?

5 Q. Well, what made him a good candidate?

6 MR. McCOY: Object to the form.

7 You can answer.

8 EXAMINATION RESUMED

9 BY MR. MURPHY:

10 Q. Was he a good candidate?

11 A. I don't know because I did not talk to him in  
12 September.

13 Q. Why did you put his name on this document?

14 A. Again, he was mentioned as an international  
15 candidate, and this is why this name was on.

16 Q. He was mentioned as an international candidate by  
17 Ms. Koepnick?

18 A. Koepnick, uh-huh.

19 Q. Are there any international candidates listed under  
20 TX-61, TX-64, or TX HR project?

21 A. No.

22 (Exhibit Number 20 marked for  
23 identification.)

24 MR. McCOY: Let's take a minute to talk about this.

25 (Recess taken.)

1 MR. ROZELSKY: Thank you.

2 (Recess taken.)

3 EXAMINATION RESUMED

4 BY MR. MURPHY:

5 Q. I want to go back to your discussion that you had  
6 with Dr. Engelhorn where he said he wanted someone  
7 to be a bridge to Germany.

8 How often did Kelly Dawsey deal with Germany when  
9 she was in TX-60?

10 A. I don't know.

11 Q. What's your perception of how often she was working  
12 with other HR people in Germany?

13 A. If you ask me about perception, then I think it was  
14 on a regular basis to share information as  
15 practice.

16 Q. Would it surprise you if Kelly were to say that she  
17 dealt with Germany almost daily?

18 A. It would be a surprise, yes, because she had  
19 Stephan Dombrowski, and she used Stephan Dombrowski  
20 towards most of the planning and steering topics.

21 Q. Did you ever get feedback from any of the BMW  
22 personnel folks in Germany about Kelly?

23 A. What kind of feedback do you talk about?

24 Q. Did they ever discuss with you they thought Kelly  
25 does a great job, Kelly does a terrible job, Kelly